

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	CASE NO. 1:15-CR-00228
	)	
Plaintiff,	)	
	)	JUDGE DONALD C. NUGENT
v.	)	
	)	
ROBERT TOTH,	)	<u>DEFENDANT'S PROPOSED</u>
	)	<u>VOIR DIRE QUESTIONS</u>
Defendant.	)	

Now comes the Defendant, Robert Toth, through undersigned counsel, and respectfully submits the following proposed voir dire questions to the Court, in addition to those that have previously been jointly submitted by the parties.

**PROPOSED QUESTIONS**

1. Do you agree that police officers are sometimes required and authorized to use force against citizens that they encounter during the course and scope of their duties?
  - a. If you do, then do you have any strong feelings for or against this right to use force in general?
  - b. If you do, then do you have preconceived notions or opinions concerning what amount of force a police officer is authorized to use in connection with his duties?

- c. If you do not, then please explain your beliefs in connection with this issue concerning use of force by a police officer.
- 2. Can you recall any recent news reports concerning police officers who were accused of using excessive force against a citizen?
  - a. If yes, describe the incident(s).
    - i. Based upon your perception of the reports concerning the incident(s), did you form any strong feelings one way or the other concerning the issue use of force by police officers, in general?
- 3. Do you believe that police officers are overly scrutinized or overly criticized by the public or by the news media in connection with their job duties, including their use of force? Do you believe that they are not scrutinized or criticized enough?
- 4. Do you believe that police officers are provided with too much power or authority over citizens?
- 5. Have you ever witnessed an incident where you believe that a police officer used what you felt was an unreasonable amount of force against a citizen?
  - a. If yes, describe the incident(s).

Respectfully submitted,

s/ Dominic J. Vitantonio  
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CERTIFICATE OF SERVICE

A copy of the foregoing *Defendant's Proposed Voir Dire Questions* was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

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